

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	
	:	
v.	:	Criminal No. 21-mj-672
	:	
RONALD LOEHRKE and	:	
	:	
JAMES HAFFNER,	:	
	:	
Defendants.	:	

**PARTIES’ JOINT MOTION TO CONTINUE THE STATUS CONFERENCE AND
TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America, by and through its attorney, and Defendants Ronald Loehke and James Haffner, by and through their counsel of record in this case, hereby move this Court for a 35-day continuance of the status conference scheduled for October 29, 2024 , and to exclude the time within which an indictment must be filed under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv). In particular, the government has produced a large volume of discovery to the defense in this case. Counsel requires time to review discovery, discuss it with their clients, and assess whether the matter should be set for trial or can be resolved short of trial. Furthermore, counsel for Defendant Loehrke remains in trial on another matter. The parties submit that the ends of justice in allowing the parties to review discovery and prepare for potential jury trial or resolution short of trial outweighs the interests of the Defendants and the public in a speedy trial.

WHEREFORE, the parties respectfully request that this Court grant the motion for a 35-day continuance of the above-captioned proceeding (i.e., until December 3, 2024), and that the

Court exclude the time within which an indictment must be filed under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv).

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
DC Bar No. 481052

By: /s/ Jason McCullough
Jason B.A. McCullough
Assistant United States Attorney
DC Bar No. 998006; NY Bar No. 4544953
601 D Street, N.W.
Washington, DC 20530
jason.mccullough2@usdoj.gov // (202) 252-7233